

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GIRARD STREET INVESTMENT  
HOLDINGS LLC,

*Plaintiff,*

v.

PDV HOLDING, INC.,

*Defendant.*

Case No. 24-cv-4448 (JSR)

**DECLARATION OF JUSTIN M. ELLIS IN SUPPORT OF  
RED TREE INVESTMENTS, LLC'S MOTION TO INTERVENE**

JUSTIN M. ELLIS declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a member in good standing of the bar of this Court. I am a partner at MoloLamken LLP, and I represent Red Tree Investments, LLC ("Red Tree"). I submit this Declaration in support of Red Tree's Motion to Intervene.

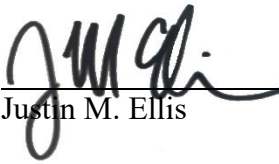
2. Attached as Exhibit A to this Declaration is Red Tree's proposed Answer to Plaintiff's Complaint.

3. Attached as Exhibit B to this Declaration is a true and correct copy of the Complaint filed in the case captioned *G&A Strategic Investments I LLC v. Petroleos de Venezuela, S.A. et al.*, No. 2024-36664 (Tex. Dist. Ct.).

4. Attached as Exhibit C to this Declaration is a true and correct copy of the email correspondence from Plaintiff's counsel to me dated June 24, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: July 24, 2024  
New York, New York



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Justin M. Ellis